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7 *Nevada Property 1, LLC dba The Cosmopolitan of Las Vegas*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 TONYA HALE,

11 Plaintiff,

12 vs.

13 THE COSMOPOLITAN OF LAS VEGAS;
14 NV PROPERTY 1, LLC dba THE
15 COSMOPOLITAN OF LAS VEGAS, a
Nevada Limited Liability Company;
RICHARD SHERMAN, an individual,

16 Defendants.

Case No. 19-CV-00780-JCM-VCF

**STIPULATION AND ORDER TO EXTEND
DISPOSITIVE MOTION DEADLINE**

18 IT IS HEREBY STIPULATED by and between Tonya Hale (“Plaintiff”), and Nevada
19 Property 1, LLC, doing business as The Cosmopolitan of Las Vegas (“TCOLV”) and (collectively
20 referred to as the “Parties”), by and through their respective counsel of record, hereby stipulate to
21 extend the deadline to file dispositive motions in this case, and agree as follows:

22 1. On November 15, 2019, this Court entered an Order granting the initial Stipulated
Discovery Plan and Scheduling Order [ECF No. 31] and agreed to extend the initial deadlines on
February 5, 2020 [ECF No. 35].

25 2. On April 2, 2020, this Court entered an Order granting the second request to extend
the Discovery Plan and Scheduling Order [ECF No. 38], on June 24, 2020 this.

27 3. On June 24, 2020 this Court entered an Order granting the parties third request to
extend the Discovery Plan and Scheduling Order [ECF No. 41] and on September 15, 2020 this

1 Court entered an Order granting the parties fourth request to extend the Discovery Plan and
2 Scheduling Order [ECF No. 47].

3 4. On October 20, 2020, this Court entered an Order granting the parties fifth request
4 to extend the Discovery Plan and Scheduling Order. [ECF No. 48]. Pursuant to the Court's order
5 the deadline to file dispositive deadline is December 23, 2020.

6 5. On December 21, 2020, this Court entered an Order granting the parties sixth request
7 to extend the dispositive motion deadline. [ECF No. 51]. Pursuant to the Court's order the deadline
8 to file dispositive deadline is January 25, 2021.

9 6. Due to issues created by mandatory quarantine and closure of Defendant's counsel's
10 office, staff member testing positive for Covid, and Defendants' counsel is experiencing her own
11 medical issues, the parties require an extension to file dispositive motion in this matter. For the
12 above stated reasons, the parties request that the dispositive motion deadline be extended thirty (30)
13 days from to **January 25, 2021 to February 24, 2021**.

14 7. Accordingly, the parties stipulate and agree to extend the dispositive motion
15 deadline for thirty (30) days, up to and including **February 24, 2021**.

16 8. As set forth in ECF No. 51, upon the filing of a dispositive motion, the date for filing
17 the joint pretrial order shall be suspended until 30 days after decision on the dispositive motions or
18 until further order of the court.

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1 9. A trial date has not yet been set in this matter, and no other deadlines are affected
2 by this stipulation.

3 This stipulation and order is sought in good faith and not for the purpose of delay.

4 Dated this 25th day of January, 2021.

5 LAW OFFICES OF MICHAEL P. BALABAN JACKSON LEWIS P.C.

6 /s/ Michael P. Balaban
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10 *Attorney for Plaintiff Tonya Hale*

11 /s/ Lisa A. McClane
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16 Las Vegas, Nevada 89101

17 *Attorneys for Defendant Nevada Property I*
18 *LLC dba The Cosmopolitan of Las Vegas*

19 **ORDER**

20 IT IS SO ORDERED January 25, 2021.

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23 U.S. Magistrate Judge

24 4838-9831-3688, v. 1